Matilda Sanders

Keating, Beth [beth.keating@akerman.com] From:

Tuesday, December 11, 2007 1:19 PM Sent:

To: Filings@psc.state.fl.us

Docket No. 070691-TP Subject:

Attachments: PDF_Scan.pdf

Attached for electronic filing in the referenced Docket, please find Bright House Network's Request for Qualified Representative Status for Christopher Savage.

Α.

Beth Keating Akerman Senterfitt 106 East College Ave., Suite 1200 Tallahassee, FL 32301 (850) 224-9634 (850) 521-8002 (direct)

(850) 222-0103 (fax) beth.keating@akerman.com

Christopher W. Savage Davis Wright Tremaine, LLP 1919 Pennsylvania Avenue, NW, Suite 200 Washington, D.C. 20006

Tel: 202-973-4200 Fax: 202-973-4499 chrissavage@dwt.com

B. Docket No. 070691-TP - Complaint and Request for Emergency Relief Against Verizon Florida, LLC for Anticompetitive Behavior in violation of Sections 364.10(4), 364.3381, and 364.10, F.S. and for failure to facilitate transfer of customers' numbers to Bright House Networks Information Services, LLC and and its affiliate, Bright House Networks, LLC

- C. On behalf of Bright House Networks Information Services, LLC and Bright House Networks, LLC
- D. Number of Pages:5
- E: Request for Qualified Representative Status



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COCUMENT NUMBER-DATE

10843 DEC 11 5

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Complaint and request for emergency)	Docket No. 070691-TP
relief against Verizon Florida, LLC for)	
anticompetitive behavior in violation of)	Filed: December 11, 2007
Sections 364.01(4), 364.3381, and 364.10,)	
F.S., and for failure to facilitate transfer of)	
customers' numbers to Bright House		
Networks Information Services (Florida),		
LLC, and its affiliate, Bright House		
Networks, LLC.		

BRIGHT HOUSE NETWORKS'S REQUEST FOR QUALIFIED REPRESENTATIVE STATUS

Pursuant to Rule 28-106.106, Florida Administrative Code, Bright House Networks Information Services, LLC, and its affiliate, Bright House Networks, LLC, (collectively, "Bright House") respectfully request that Christopher W. Savage, Esquire, partner with the law firm of Davis Wright Tremaine, LLP, be named as a qualified representative authorized to appear on behalf of Bright House before the Florida Public Service Commission for the duration of this proceeding. In accordance with the referenced Rule, Bright House affirms that it is aware of its right to be represented by counsel that is a member of the Florida Bar, and that it is fully cognizant of the services that Mr. Savage can provide.

Attached hereto is the sworn Affidavit of Christopher W. Savage, setting forth Mr. Savage's qualifications as required by Rule 28-106.106, Florida Administrative Code. Mr. Savage's address is:

Davis Wright Tremaine LLP 1919 Pennsylvania Ave., NW, Suite 200 Washington, D.C. (202) 973-4211

For all the foregoing reasons, Bright House respectfully requests that its Request for

10843 DEC 11 & FPSC-COMMISSION CLERK

{TL142379;1}

Qualified Representative Status be granted.

Respectfully submitted,

By:

Beth Keating, Esquire Akerman Senterfitt

106 East College Avenue, Suite 1200

P.O. Box 1877 (32302) Tallahassee, Florida 32301

(850) 521-8002

beth.keating@akerman.com

Attorneys for Bright House

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via via Electronic Mail to the persons listed below this 11th day of December, 2007:

Dulaney L. O'Roark, III, VP/General Counsel	David Christian*
Verizon Florida, LLC	Verizon Florida, Inc.
P.O. Box 110, MC FLTC 0007	106 East College Ave.
Tampa, FL 33601	Tallahassee, FL 32301-7748
de.oroark@verizon.com	David.christian@verizon.com
Patrick Wiggins, Supervising Attorney	Beth Salak, Director/Competitive Markets and
Florida Public Service Commission,	Enforcement
Office of the General Counsel	2540 Shumard Oak Blvd.
2540 Shumard Oak Blvd.	Tallahassee, FL 32399-0850
Tallahassee, FL 32399-0850	bsalak@psc.state.fl.us
pwiggins@psc.state.fl.us	

By:

Beth Keating

Akerman Senterfitt

106 East College Avenue, Suite 1200

P.O. Box 1877 (32302)

Tallahassee, Florida 32301

(850) 521-8002 Fax: (850) 222-0103

beth.keating@akerman.com

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

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Networks Information Services (Florida),		
LLC, and its affiliate, Bright House		
Networks, LLC.		

AFFIDAVIT OF CHRISTOPHER W. SAVAGE

District of Columbia

- I, CHRISTOPHER W. SAVAGE, being first duly sworn, do hereby affirm and attest as follows:
- 1. I am an attorney and partner with the national law firm of Davis, Wright, Tremaine, LLP, and have been retained as counsel for Bright House Networks Information Services, LLC, and its affiliate, Bright House Networks, LLC, (collectively, "Bright House").
- 2. I am a member of good standing of the Bar of the District of Columbia, as well as the California Bar, and am seeking qualified representative status to appear on behalf of Bright House before the Florida Public Service Commission.
- 3. I have extensive commercial, regulatory, cable, Internet and telecommunications-specific litigation experience and have appeared in matters before numerous federal and state courts, as well as state utility regulatory bodies, including, on various occasions, the Florida Public Service Commission.
- 4. I am familiar with Florida Statutes and the Florida Administrative Code, as well as Florida practice rules.
- 5. The foregoing statements are true and correct to the fullest extent of my knowledge and belief.

Christopher W. Savage, Esquire

BEFORE ME, the undersigned authority, persona personally known by me or who has produce identification and did execute the foregoing.	
SWORN TO AND SUBSCRIBED before me this _	day of December, 2007.
	Motary Public
	Gina H. Lee Notary Public, District of Columbia My Commission Expires 06-30-2009
	Typed, Printed, or Stamped Name My Commission Expires: 6/30/209